

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MOTION FOR EXTENSION OF TIME

AND NOW comes the United States of America, by its attorneys, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and Jessica Lieber Smolar and Nicole Ann Stockey, Assistant United States Attorneys for said District, and Dmitriy Slavin, Trial Attorney, National Security Division, and hereby submits this motion on behalf of the government for a one week extension of time to file the government's response to the defendant's objections to the Presentence Investigation Report ("PSR") (Doc. 291).

On December 20, 2021 and January 7, 2022, the Court entered its Orders (Docs. 282 and 284) regarding the sentencing of the defendant, Khaled Miah. The Court ordered the parties to file positions with respect to the sentencing factors and objections to the PSR by March 7, 2022 and any responses to such objections by March 14, 2022. (Doc 282). The government did not have any objections to the PSR. (Doc. 289). The defendant, on the other hand, did have various objections to the PSR and submitted an extensive 17-page filing with additional facts, legal argument and exhibits. The defendant's filing is in essence a sentencing memorandum. (Doc. 291).

Accordingly, the government respectfully requests one additional week to respond to the defendant's objections. (Doc. 291). The government does not seek this extension to create any undue delay, but instead, requests this short extension of time to allow it to fully research and brief the contested sentencing enhancements to fully assist the Court.

The government does not believe that extending this deadline of March 14, 2022 by one week to March 21, 2022 will impact the defendant's sentencing hearing, which is currently scheduled for April 28, 2022. That said, the government defers to the Court as to any changes to the sentencing schedule and corresponding deadlines.

Respectfully submitted,

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